

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 14-20034**  
**Janus Aguila** : **Chapter 13**  
: **Judge Ashely M. Chan**  
**Debtor(s).** : **\*\*\*\*\***

**Janus Aguila, Cristobal Aguila, William** :  
**C. Miller** : **Related to Document No. 74**  
**Movant** :  
**v.** :  
:   
**Wells Fargo Bank, N.A.** :  
**Respondent** :  
:

**RESPONSE TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY**  
**(DOCKET # 74)**

Now comes Wells Fargo Bank, N.A. ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion to Reconsider Order Modifying Automatic Stay ("Motion") by Janus Aguila ("Debtor") on December 5, 2017 at Docket # 74. Creditor states that Debtor's account is not post-petition current and to reinstate the stay would be prejudicial to Creditor and avers as follows:

1. Admitted.
2. Admitted.
3. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required.
4. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required.
5. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required.
6. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required.

7. Denied. Respondent lacks sufficient knowledge or information to form a belief as to the truth of averments contained in the corresponding paragraph.
8. Denied. Respondent lacks sufficient knowledge or information to form a belief as to the truth of averments contained in the corresponding paragraph. By way of further response, Debtor is due for the July 1, 2017 through January 1, 2018 post-petition payments in the amount of 1,489.86 each, to total \$10,429.02 plus fees of \$100.00 incurred for the notice of default as well as the fees in the amount of \$450.00 for responding to the current Motion, bringing the total due to \$10,979.02. In addition, Creditor has incurred fees and costs of \$504.95 in the resumption of the foreclosure action in the Delaware County Court of Common Pleas since relief. Thus, the total needed to cure the post petition default is \$11,988.92.

WHEREFORE, Creditor respectfully requests that the Debtor's motion for reconsideration be denied.

Respectfully submitted,

/s/ Karina Velter

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